

i. Scholarships on the basis of merit or need are available to qualified parties.

REBUTTAL: ST. MATTHEW's offers three academic scholarships annually with a total value of \$10,000 each. ST. MATTHEW's also offers one Caymanian scholarship annually to a worthy, qualified Caymanian. That scholarship is worth a total of \$45,000.

78. Under AAIMG's criteria labeled "Section VIII. Legal/Other," AAIMG cites the following category as "deficient":

c. Each school is evaluated for a history of failing to return tuition or deposits in a timely manner.

REBUTTAL: ST. MATTHEW's returns tuition or deposits absolutely according to its catalog requirements. It is clearly stated in ST. MATTHEW's catalog, and is required of ST. MATTHEW's license issued by the Commission for Independent Education in the state of Florida, that all refunds will be made within 30 days of request. ST. MATTHEW's is not aware of a single case when a refund was later than the 30 days allowed.

79. AAIMG makes the additional, false statements regarding ST. MATTHEW's:

a. AAIMG states that ST. MATTHEW's is located in Ambergris Caye, Belize, Central America.

REBUTTAL: ST. MATTHEW's is based in Grand Cayman, Cayman Islands, British West Indies.

b. This school has experienced serious internal management problems with both high faculty and administrative turnover.

REBUTTAL: More than three years ago ST. MATTHEW's replaced its president, his wife, and an accountant, prior to ST. MATTHEW's move from Belize to the Cayman Islands; however, ST. MATTHEW's retained all of its U.S. management and a large number of its faculty and staff through the move.

c. Relocation of basic science campus last year to a rented office building in the Cayman Islands provides only the most basic classroom facilities.

1 REBUTTAL: This statement is completely inaccurate. ST. MATTHEW's has
 2 21,000 square feet of leased space, which is a three story building totally occupied by
 3 ST. MATTHEW'S, and renovated to meet its specific needs, including being
 4 completely wired for high-speed internet access. As stated above, ST. MATTHEWS
 5 has also purchased a second residence hall, which gives it housing for 255 students
 6 on five acres of land, on which it will be building its new permanent campus.

7 ***d. The labs and library remain inadequate; plastinated parts are used in***
 8 ***anatomy instead of cadavers.***

9 REBUTTAL: ST. MATTHEW's labs are fully-equipped and state-of-the-art. As
 10 stated above, ST. MATTHEW's, like almost half of U.S. medical schools, provides
 11 plastinated cadavers in its anatomy classes, which provide for more detailed
 12 anatomical study.

13 ***e. School is very decentralized and the Maine campus at a small remote college***
 14 ***still lacks proper structure for a basic science instruction.***

15 REBUTTAL: ST. MATTHEW's has its own private facilities in Maine, with
 16 excellent faculty and administrators, and a strong clinical skills program. AAIMG's
 17 implies that ST. MATTHEW's is located at St. Joseph's College campus, which is
 18 untrue.

19 ***f. Portion of instruction done in USA may create licensing problems, although***
 20 ***this school is still too new for many test cases. Possible licensing issues are***
 21 ***still not realistically addressed by the school.***

22 REBUTTAL: All student credits are listed on the Grand Cayman transcript
 23 including those completed on the Maine campus – thus this is not an issue in regards
 24 to licensing.

25 ***g. School takes significant amount of transfer students and failures from other***
 26 ***medical schools.***

27 REBUTTAL: ST. MATTHEW's accepts a small percentage of transfer students
 28 from other accredited medical schools, as do all of the Caribbean schools and most

1 medical schools around the world.

2 ***h. Web site is misleading as to facility and actual onsite fulltime faculty.***

3 REBUTTAL: As stated above, ST. MATTHEW's accurately lists and identifies
4 all of its faculty members on its website, including accurate photographs and
5 credentials. All of ST. MATTHEW's faculty members are full-time with a few
6 exceptions of local practicing physicians who teach portions of the clinical skills
7 program.

8 ***i. Clerkship program is loosely organized.***

9 REBUTTAL: ST. MATTHEW's clerkship program is tightly organized. ST.
10 MATTHEW's has a Clinical Dean, who in turn has five Clinical Chiefs (one for each
11 specialty) under him. Clinical chiefs oversee the Preceptors (teaching physicians) in
12 ST. MATTHEW's affiliated teaching hospitals. ST. MATTHEW's additionally has
13 Clinical Coordinators that assign students to rotations and monitor their placement
14 and progress. ST. MATTHEW's gives the NBME Shelf Exams following each core
15 rotation. Each student must complete a daily log, which is submitted to the Clinical
16 Dean for review and grading. ST. MATTHEW's accrediting body, the Accreditation
17 Commission on Colleges of Medicine, is approved by the U.S. Department of
18 Education's National Committee on Foreign Medical Education and Accreditation, and
19 this body oversees ST. MATTHEW's clinical clerkship programs and has approved its
20 program.

21 **INJURY TO ST. MATTHEW'S**

22 80. ST. MATTHEW's has been grievously and irreparably injured as a result of
23 AAIMG's, and AAIMG's agents' and representatives', unlawful and unethical conduct,
24 including, but not limited to:

- 25 ▪ damage to reputation;
- 26 ▪ loss of applicants and student enrollment – past, present and future;
- 27 ▪ interference with accreditation proceedings; and
- 28 ▪ denials of residency placements for ST. MATTHEW's hard-working medical

1 graduates.

2 The forgoing injuries are of such a nature and to such a degree that ST. MATTHEW's has
3 no adequate remedy at law.

4 81. Such contemptible acts and practices on the part of the Defendants call for the
5 maximum amount of exemplary damages awardable.

6 **FIRST CLAIM FOR RELIEF**

7 **Defamation**

8 **(As to All Defendants)**

9 82. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1
10 through 81 of this Complaint.

11 83. Defendants' actions as described above constitute defamation, in that:

12 84. Defendants have made false statements regarding Plaintiff ST. MATTHEW's,
13 ident fied and rebutted in detail in the above paragraphs 68 through 78, incorporated
14 herein by reference as though listed here;

15 85. Defendants' statements constitute defamation *per se*, in that they defame Plaintiff
16 in its trade;

17 86. Defendants knew or should have known that the statements published were false;

18 87. Defendants published these statements to various third parties without privilege;

19 88. As a proximate result of the foregoing acts, these Defendants have caused actual
20 harm and are liable to Plaintiffs for damages in an amount to be proven at trial.

21 89. Defendants have engaged in conduct of an oppressive, fraudulent, and malicious
22 nature, thereby entitling Plaintiffs to an award of punitive damages.

23 90. As a direct and proximate result of the actions, conduct, and practices of
24 Defendants alleged above, Plaintiff has been damaged and will continue to be damaged.

25 91. Plaintiff has no adequate remedy at law.
26
27
28

SECOND CLAIM FOR RELIEF

Fraud / Intentional Misrepresentation

(As To All Defendants)

92. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 91 of this Complaint.

93. The acts of Defendants as described above constitute fraud or intentional misrepresentation, in that:

94. Defendants have made material misrepresentations and omissions as to the nature and quality of Plaintiff ST. MATTHEW's educational services, faculty, and facilities, and as to the nature, acts, affiliations, and identities of Defendant AAIMG and individual Defendants, as detailed above.

95. Said misrepresentations and omissions were made with the knowledge or belief that the representations were false or without a sufficient basis for making the representations at the time that such representations were made.

96. Defendants intended to induce third persons to act based upon these representations and omissions, to the detriment of Plaintiff;

97. Third persons have justifiably relied upon such misrepresentations and omissions by accepting the critical statements regarding Plaintiff as accurate and acting in accordance thereto, including (but not limited to) choosing not to enroll with Plaintiff school, or denying Plaintiff's graduates post-graduate placements, or denying certain accreditations, all to the extreme detriment and injury of Plaintiff.

98. As a direct and proximate result of Defendants' acts as alleged herein, Plaintiffs have suffered and will continue to suffer damage to their business, goodwill, reputation and profits in an amount to be determined at trial.

99. Defendants have engaged in conduct of an oppressive, fraudulent, and malicious nature, thereby entitling Plaintiffs to an award of punitive damages.

100. Plaintiff has no adequate remedy at law.

THIRD CLAIM FOR RELIEF

**For Violations of Nevada R.S. § 598.0915 (Acts of Deceptive Trade Practice)
(As To All Defendants)**

101. Plaintiff realleges and incorporates by reference paragraphs 1 through 100 of this complaint as though set forth fully herein.

102. By the acts described above, Defendants have engaged in unlawful and unfair business practices and have conducted unfair, deceptive and misleading advertising which has injured and threatens to continue to injure Plaintiff in its business and property. Defendants' conduct constitutes unfair business practices under Nevada R.S. § 598.0915 *et seq.*, in that Defendants, as a non-exclusive list of examples:

- a. Knowingly make false representations as to affiliation, connection, association with or certification by another person (N.R.S. § 598.0915(3));
- b. Knowingly makes a false representation as to the characteristics, ingredients, uses, benefits, alterations or quantities of goods or services for sale or lease or a false representation as to the sponsorship, approval, status, affiliation or connection of a person therewith (N.R.S. § 598.0915(5));
- c. Represents that goods or services for sale or lease are of a particular standard, quality or grade, or that such goods are of a particular style or model, if he knows or should know that they are of another standard, quality, grade, style or model (N.R.S. § 598.0915(7));
- d. Disparages the goods, services or business of another person by false or misleading representation of fact (N.R.S. § 598.0915(8)); and
- e. Knowingly makes any other false representation in a transaction (N.R.S. § 598.0915(15)).

103. As a direct result of the foregoing acts and practices, Plaintiff has suffered, and will continue to suffer, damages and irreparable harm.

104. Plaintiff has no adequate remedy at law.

FOURTH CLAIM FOR RELIEF

**Federal Unfair Competition Comprising False and Misleading Statements of Fact
Under Section 43(a) of the Lanham Act, 15 USC §1125(a)
(As To All Defendants)**

105. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 104 of this Complaint.

106. By engaging in the above-described activities, Defendants have made false and misleading representations of fact as to their ownership of and associations, all in violation of Section 43(a)(1)(B) of the Lanham Act, 15 USC §1125(a)(1)(B).

107. As a direct and proximate result of the actions, conduct, and practices of Defendants alleged above, Plaintiff has been damaged and will continue to be damaged.

108. Plaintiff has no adequate remedy at law.

FIFTH CLAIM FOR RELIEF

**Intentional Interference With Contractual Relations
(As To All Defendants)**

109. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 108 of this Complaint.

110. The aforesaid acts of Defendants constitute common tortious interference with Plaintiff's existing contractual relations with existing students, prospective students, graduates, and clinical residency providers, in that Defendants knew of these contractual relations, and purposefully and intentionally acted to interfere with the performance or existence of these contractual relations, or to induce others to do so, to the detriment of Plaintiff.

111. As a direct and proximate result of Defendants' acts, Plaintiff has suffered, and will continue to suffer, damages and irreparable harm.

112. Plaintiff has no adequate remedy at law.

SIXTH CLAIM FOR RELIEF

Intentional Interference With Prospective Economic Advantage

(As To All Defendants)

113. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 112 of this Complaint.

114. The aforesaid acts of Defendants constitute common tortious interference with Plaintiff's prospective economic advantage with existing students, prospective students, graduates, and clinical residency providers, in that Defendants acted purposefully and intentionally to prevent the coming to fruition of potential economic advantages Defendants knew to exist, with the intent of harming Plaintiff.

115. As a direct and proximate result of Defendants' acts, Plaintiff has suffered, and will continue to suffer, damages and irreparable harm.

116. Plaintiff has no adequate remedy at law.

///

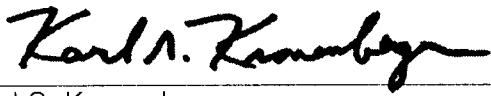
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court enter judgment in its favor on each and every claim set forth above, and further prays an award to Plaintiff of:

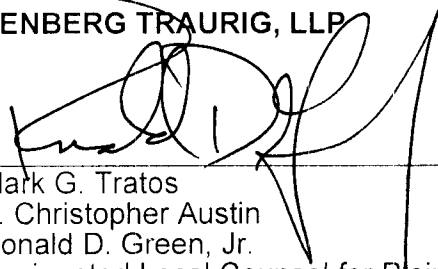
1. Compensatory damages in an amount according to proof, but not less than \$15,000,000;
2. Punitive damages in an amount to be determined, but in no case less than treble Plaintiff's damages or \$45,000,000, whichever is greater;
3. A preliminary and permanent injunction ordering the taking down of AAIMG's website, and replacing it with a published copy of the judgment awarded Plaintiff in the present case, and a public apology and retraction by those responsible for perpetration of the acts upon which the awards are based;
4. Plaintiff's costs and attorneys' fees in this action; and
5. Such other further relief to which Plaintiff may be entitled as a matter of law or equity, or which the Court determines to be just and proper.

DATED: July 7, 2005.

KRONENBERGER & ASSOCIATES

By: 
Karl S. Kronenberger
Terri R. Hanley
Attorneys for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

DATED: July 11, 2005.

GREENBERG TRAURIG, LLP
By: 
Mark G. Tratos
F. Christopher Austin
Ronald D. Green, Jr.
Designated Local Counsel for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD

DEMAND FOR JURY TRIAL

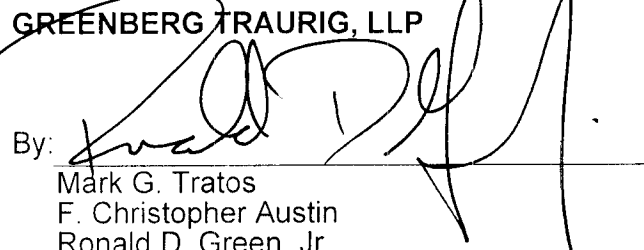
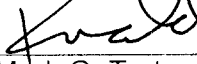
Plaintiff ST. MATTHEW'S hereby demands a trial of this action by jury.

Dated: July 7, 2005

KRONENBERGER & ASSOCIATES

By: 
Karl S. Kronenberger
Terri R. Hanley
Attorneys for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

DATED: July 11, 2005.

GREENBERG TRAURIG, LLP

By: 
Mark G. Tratos
F. Christopher Austin
Ronald D. Green, Jr.
Designated Local Counsel for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

ASSOCIATION OF AMERICAN INTERNATIONAL MEDICAL GRADUATES

Corporation Information			
Status:	Active	File Date:	9/7/1999
Type:	NRS78 - Domestic Corporation	Corp Number:	C21961-1999
Qualifying State:	NV	List of Officers Due:	9/30/2005
Managed By:		Expiration Date:	
Foreign Name:		On Admin Hold:	False

Resident Agent Information			
Name:	VAL-U-CORP SERVICES, INC.	Address 1:	1802 N CARSON ST.
Address 2:	#212	City:	CARSON CITY
State:	NV	Zip:	89701
Phone:		Fax:	
Email:		Mailing Address 1:	
Mailing Address 2:		Mailing City:	
Mailing State:		Mailing Zip:	

Financial Information			
No Par Share Count:	25,000.00	Capital Amount:	\$ 0
No stock records found for this company			

Officers				<input checked="" type="checkbox"/> Include Inactive Officers
President - THOMAS MOORE, MD				
Address 1:	1802 N CARSON ST STE 212	Address 2:		
City:	CARSON CITY	State:	NV	
Zip:	89701	Country:		
Status:	Active	Email:		
President - THOMAS MOORE, MD				
Address 1:	1802 N CARSON ST STE 212	Address 2:		
City:	CARSON CITY	State:	NV	
Zip:	89701	Country:		
Status:	Historical	Email:		
Treasurer - RACHAEL SILVER				
Address 1:	1802 N CARSON ST STE 212	Address 2:		
City:	CARSON CITY	State:	NV	
Zip:	89701	Country:		
Status:	Historical	Email:		
Treasurer - RACHAEL SILVER				
Address 1:	1802 N CARSON ST STE 212	Address 2:		
City:	CARSON CITY	State:	NV	
Zip:	89701	Country:		
Status:	Active	Email:		

Corporation Details - Secretary of State, Nevada

[https://esos.state.nv.us/SOSServices/AnonymousAccess/CorpSear ..](https://esos.state.nv.us/SOSServices/AnonymousAccess/CorpSear..)

Secretary - SARAH WEINSTEIN			
Address 1:	1802 N CARSON ST STE 212	Address 2:	
City:	CARSON CITY	State:	NV
Zip:	89701	Country:	
Status:	Active	Email:	
Secretary - SARAH WEINSTEIN			
Address 1:	1802 N CARSON ST STE 212	Address 2:	
City:	CARSON CITY	State:	NV
Zip:	89701	Country:	
Status:	Historical	Email:	

Actions/Amendments			
Action Type:	Articles of Incorporation		
Document Number:	C21961-1999-001	# of Pages:	2
File Date:	09/07/1999	Effective Date:	
(No Notes for this action)			
Action Type:	Amendment		
Document Number:	C21961-1999-003	# of Pages:	1
File Date:	10/03/2000	Effective Date:	
REINSTATED-REVOKED 8/1/00 GXH			
Action Type:	Annual List		
Document Number:	C21961-1999-002	# of Pages:	1
File Date:	09/21/2004	Effective Date:	
List of Officers for 2004 to 2005			



Corporation Actions for "ASSOCIATION OF AMERICAN INTERNATIONAL MEDICAL GRADUATES"

Sort by ☒ descending ☐ ascending order

1 - 3 of 3 actions

Actions\Amendments			
Action Type:	Annual List		
Document Number:	C21961-1999-002	# of Pages:	1
File Date:	09/21/2004	Effective Date:	
List of Officers for 2004 to 2005			
Action Type:	Amendment		
Document Number:	C21961-1999-003	# of Pages:	1
File Date:	10/03/2000	Effective Date:	
REINSTATED-REVOKED 8/1/00 GXH			
Action Type:	Articles of Incorporation		
Document Number:	C21961-1999-001	# of Pages:	2
File Date:	09/07/1999	Effective Date:	
(No Notes for this action)			

[Return to Corporation Details for "ASSOCIATION OF AMERICAN INTERNATIONAL MEDICAL GRADUATES"](#)

SOS Contact Information



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FILED
IN THE OFFICE OF THE
SECRETARY OF STATE OF THE
STATE OF NEVADA

03. 7/19/99 11:17A 503/145 F700-000-12957

(125.00) PE

SEP 07 1999

Articles of Incorporation

OF

No. 021961-99
Dean Heller
DEAN HELLER, SECRETARY OF STATE

Association of American International Medical Graduates

Article I

The name of the corporation is: Association of American International Medical Graduates

Article II

The Resident Agent of the corporation is Val-U-Corp Services, Inc. The address of the Resident Agent where process may be served is:

1802 N. Carson St., Suite 212
Carson City, Nevada 89701

Article III

The number of shares the corporation is authorized to issue is 25,000 shares with no par value. The stock shall be non-assessable.

Article IV

The governing board of the corporation shall be styled as Directors. The First Board of Directors shall consist of one (1) member whose name and address is listed as follows:

Daniel A. Kramer
1802 N. Carson St., Suite 212
Carson City, Nevada 89701

Article V

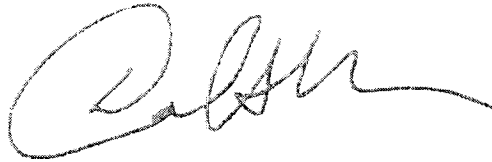
The purpose of the corporation shall be general business and any legal activity.

Article VI

The Incorporator's name and address is listed as follows:

Daniel A. Kramer
1802 N. Carson St., Suite 212
Carson City, Nevada 89701

I, the undersigned, being the Incorporator hereinbefore named for the purpose of forming a corporation pursuant to General Corporation Law of the State of Nevada, do make and file these Articles of Incorporation, hereby declaring and certifying that the facts herein stated are true, and accordingly have hereunto set my hand this August 30, 1999.

A handwritten signature in dark ink, appearing to read 'D. Kramer', with a long horizontal flourish extending to the right.

Daniel A. Kramer
Incorporator

I, Val-U-Corp Services, Inc., hereby accept appointment as Resident Agent for the previously named corporation this August 30, 1999.

A handwritten signature in dark ink, appearing to read 'D. Kramer', with a long horizontal flourish extending to the right.

Daniel A. Kramer
President

(PROFIT) ANNUAL LIST OF OFFICERS, DIRECTORS AND RESIDENT AGENT OF

FILE NUMBER:

Association of American International Medical Graduates

c21961-99

(Name of Corporation)

A Nevada CORPORATION

FOR THE FILING PERIOD 9/01 TO 9/02

The corporation's duly appointed resident agent in the State of Nevada upon whom process can be served is:

Val-U-Corp Services, Inc.
 7802 N. Carson Street, Suite 212
 Carson City, NV 89701

IF AGENT INFORMATION HAS CHANGED, PLEASE SEE ATTACHED
 INSTRUCTIONS ON HOW TO OBTAIN THE APPROPRIATE FORM.

Office Use Only

FILED
 SEP 22 2001
 Dean Heller
 Secretary of State

Important: Read instructions before completing and returning this form.

1. Print or type names and addresses, either residence or business, for all officers and directors. A president, secretary, treasurer and at least one other officer must be named. Have an officer sign the form. FORM WILL BE RETURNED IF UNDESIGNED.
2. If there are additional directors attach a list of them to this form.
3. Return the completed form with the \$35.00 filing fee. A \$50.00 penalty must be added for failure to file this form by the last day of the anniversary month of the incorporation/initial registration with this office.
4. Make your check payable to the Secretary of State. Your cancelled check will constitute a certificate to transact business per NRS 78.155. If you need a receipt, return page 2 certificate and **ENCLOSURE LABEL**.
5. Return the completed form to: Secretary of State, 202 North Carson Street, Carson City, NV 89701-4201, (775) 684-8708.

FILING FEE \$35.00 LATE PENALTY \$50.00

NAME	Thomas Moore, MD		TITLE(S)	PRESIDENT		
PO BOX	STREET ADDRESS	1802 N. Carson Ste. 212	CITY	Carson City	ST	NV ZIP 89701
NAME	Sarah Weinstein		TITLE(S)	SECRETARY		
PO BOX	STREET ADDRESS	1802 N. Carson Ste. 212	CITY	Carson City	ST	NV ZIP 89701
NAME	Rachael Silver		TITLE(S)	TREASURER		
PO BOX	STREET ADDRESS	1802 N. Carson Ste. 212	CITY	Carson City	ST	NV ZIP 89701
NAME	Diedre Moore		TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS	1802 N. Carson Ste. 212	CITY	Carson City	ST	NV ZIP 89701
NAME			TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS		CITY		ST	ZIP
NAME			TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS		CITY		ST	ZIP

I declare, to the best of my knowledge, under penalty of perjury that the above mentioned entity has complied with the provisions of chapter 364A of NRS.

A. Signature of Officer

Rachael E. Silver

Title(s)

Secretary

Date 8.29.01

Nevada Secretary of State Form ANNUAL LIST (PROFIT) 1000 01
Revised Oct. 07/21/01

(Form) ANNUAL LIST OF OFFICERS, DIRECTORS AND RESIDENT AGENT OF

FILE NUMBER:

Association of American International Medical Graduates

c21961-99

A Nevada CORPORATION
(State of Incorporation)FOR THE FILING PERIOD 9/02 TO 9/03

The corporation's duly appointed resident agent in the State of Nevada upon whom process can be served is:

Val-U-Corp Services, Inc.
1802 N. Carson Street, Suite 212
Carson City, NV 89701

IF AGENT INFORMATION HAS CHANGED, PLEASE SEE ATTACHED INSTRUCTIONS ON HOW TO OBTAIN THE APPROPRIATE FORM.

Offices Use Only

FILED #

OCT 02 2002

IN THE OFFICE OF
DEAN HELLER, SECRETARY OF STATE

Important: Read instructions before completing and returning this form.

1. Print or type names and addresses, other residence or business, for all officers and directors. A president, secretary, treasurer and at least one director must be named. Have an officer sign the form.
2. If there are additional directors attach a list of them to this form.
3. Return the completed form with the \$100.00 filing fee. A \$20.00 penalty must be added for failure to file the form by the last day of the anniversary month of the incorporation/initial registration with this office.
4. Make your check payable to the Secretary of State. Your completed check will constitute a certificate to accept business per NRS 78.155. If you need a receipt, return page 3 certificate and **ENCLOSURE 2**.
5. Return the completed form to Secretary of State, 202 North Carson Street, Carson City, NV 89701-4201, (775) 684-6708.

FILING FEE: \$100.00 LATE PENALTY: \$20.00

NAME	Thomas Moore, MD				TITLE(S)	PRESIDENT		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				
	1802 N. Carson Suite 212	Carson City	NV	89701				
NAME	Sarah Weinstein				TITLE(S)	SECRETARY		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				
	1802 N. Carson Suite 212	Carson City	NV	89701				
NAME	Rachael Silver				TITLE(S)	TREASURER		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				
	1802 N. Carson Suite 212	Carson City	NV	89701				
NAME	Diedre Moore				TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				
	1802 N. Carson Suite 212	Carson City	NV	89701				
NAME					TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				
NAME					TITLE(S)	DIRECTOR		
PO BOX	STREET ADDRESS	CITY	ST	ZIP				

I declare to the best of my knowledge under penalty of perjury that the above mentioned entity has complied with the provisions of chapter 364A of NRS.

X Signature of Officer

Rachael E Silver

Treasurer/Sec

Date 9/13/02

No fee to Secretary of State Form 100-02, LIST-PRECIPT 1608.01
Revised 02/03/01

(PROFIT) ANNUAL LIST OF OFFICERS, DIRECTORS AND RESIDENT AGENT OF

FILE NUMBER

Association of American International Medical Graduates

021951-99

(Name of Corporation)

A Nevada CORPORATION

FOR THE FILING PERIOD 9/03 TO 9/04

The corporation's duly appointed resident agent in the State of Nevada upon whom process can be served is:

Val-U-Corp Services, Inc.
1802 N. Carson St., Suite 212
Carson City, NV 89701

IF AGENT INFORMATION HAS CHANGED, PLEASE SEE ATTACHED
INSTRUCTIONS ON HOW TO OBTAIN THE APPROPRIATE FORM.

Office Use Only

FILED #

OCT 09 2003

IN THE OFFICE OF
Don Hill
CLERK/CLERK SECRETARY OF STATE

Important: Read instructions before completing and returning this form.

- Print or type names and addresses, either residence or business, for all officers and directors. A president, secretary, treasurer and at least one director must be named. Have an officer sign the form. **FORM WILL BE RETURNED IF UNSIGNED.**
- If there are additional directors attach a list of them to this form.
- Return the completed form with the \$85.00 filing fee. A \$50.00 penalty must be added for failure to file this form by the last day of the anniversary month of the incorporation/initial registration with this office.
- Make your check payable to the Secretary of State. Your cancelled check will constitute a certificate to transact business per NRS 78.155. If you need a receipt, return page 2 certificate and **ENCLOSE A SELF-ADDRESSED STAMPED ENVELOPE.** To receive a certified copy, enclose a copy of this completed form, an additional \$20.00 and appropriate instructions.
- Return the completed form to: Secretary of State, 212 North Carson Street, Carson City, NV 89701-4201, (775) 684-5708

FILING FEE: \$85.00 LATE PENALTY: \$50.00

NAME	Thomas Moore, MD				TITLE(S)	PRESIDENT	
PO BOX	STREET ADDRESS	CITY	ST	ZIP			
	1802 N. Carson Suite 212	Carson City	STNV	89701			
NAME	Sarah Weinstein				TITLE(S)	SECRETARY	
PO BOX	STREET ADDRESS	CITY	ST	ZIP			
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NAME	Rachael Silver				TITLE(S)	TREASURER	
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NAME	Diedre Moore				TITLE(S)	DIRECTOR	
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	1802 N. Carson Suite 212	Carson City	STNV	89701			
NAME					TITLE(S)	DIRECTOR	
PO BOX	STREET ADDRESS	CITY	ST	ZIP			
NAME					TITLE(S)	DIRECTOR	
PO BOX	STREET ADDRESS	CITY	ST	ZIP			

I declare, to the best of my knowledge, under penalty of perjury, that the above mentioned entity has complied with the provisions of chapter 364A of NRS.

Signature of Officer

Rachael E Silver

Title(s)

Secretary

Date

9.15.03

Nevada Secretary of State Form ANNUAL LIST (PROFIT) 1999-01
Revised on 07-21-01

IC-115571

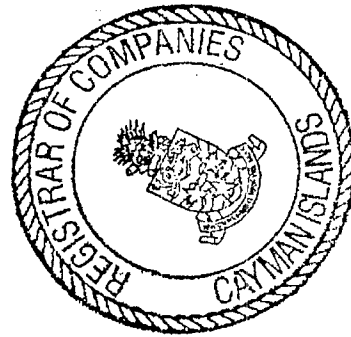
Certificate Of Good Standing

TO WHOM IT MAY CONCERN

I DO HEREBY CERTIFY that

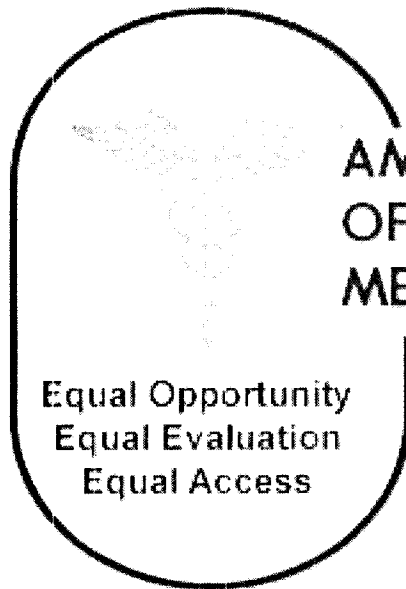
St. Matthew's University (Cayman) Ltd.

a company duly organized and existing under and by virtue of the Laws of The Cayman Islands is at the date of this certificate in Good Standing with the office, and duly authorized to exercise therein all the powers vested in the company.



Given under my hand and Seal at George Town in the Island of Grand Cayman this 1st day of March
Two Thousand Four

[Signature]
An Authorised Officer,
Registry of Companies,
Cayman Islands, B.W.I.



AMERICAN ASSOCIATION OF INTERNATIONAL MEDICAL GRADUATES

[click here to enter](#)



AB!

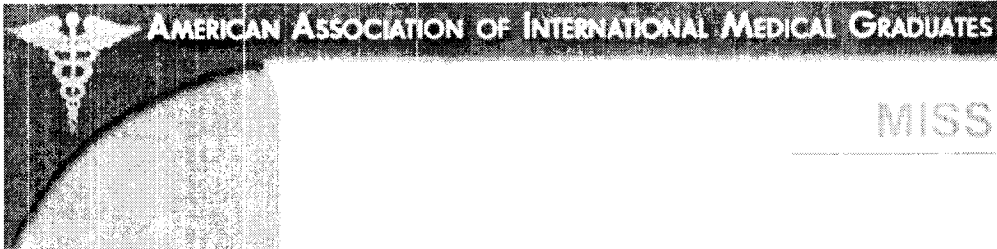
All Serious Medical Students Need
to Read the AAIMG "Words of Wisdom."

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MISSION STATEMENT


Equal OpportunityEqual Opportunity

The American Association of International Medical Graduates, hereafter referred to as **AAIMG**, was founded in 1992 as a non-profit organization to promote acceptance of United States citizen international medical graduates into mainstream American medical practice.

AAIMG recognizes that thousands of highly qualified U.S. citizens are denied admission to medical school each year and must study abroad. Current medical school admission standards in the United States overemphasize the importance of standardized tests and grade point average.

AAIMG recognizes that there are many qualities that go into the making of a skilled, compassionate physician. The organization therefore does not define merit solely on the basis of test scores and grades. We support the right of individuals who are denied access to medical education in their own country to seek professional satisfaction by studying medicine outside of the continental United States.

AAIMG recognizes that there are layers of prejudice and discrimination that must be overcome in order for American International Medical Graduates to gain fair access to postgraduate training positions and professional employment opportunities.






AMERICAN ASSOCIATION OF INTERNATIONAL MEDICAL GRADUATES

GOALS OF THE AAIMG

- To serve as an accurate information source for American citizens unable to gain acceptance into medical schools in the United States.
- To encourage training directors and hospitals in the United States to provide clerkship opportunities in the third and fourth year to American citizens studying medicine abroad.
- To promote equality of testing and evaluation of all International Medical Graduates.
- To encourage residency training directors to give equal consideration to qualified American International Medical Graduates for postgraduate training positions.
- To promote equal treatment of International Medical Graduates by all fifty state licensing boards.
- To overcome prejudice in the mainstream American medical community and society at large toward our citizens who study medicine abroad.






AMERICAN ASSOCIATION OF INTERNATIONAL MEDICAL GRADUATES

EVALUATION PROCESS

EVALUATION PROCESS OF INTERNATIONAL MEDICAL SCHOOLS

Alarmed by the world wide proliferation of medical schools recruiting U.S. citizens, in 1999 AAIMG launched a comprehensive study of **Caribbean Basin** medical schools to assist prospective medical students with objective screening criteria and evaluative data. Since that period, evaluations of medical schools catering to American citizens in **Mexico, Central America, the United Kingdom and Eastern Europe** have been completed in 2001 and 2003. The small number of schools in the Pacific Basin are no longer operating according to the latest World Health Organization report.

Initially, the World Health Organization was contacted to verify current listing of all schools in these regions. In some cases, local governments were contact to determine actual physical presence of the medical school and the ability of graduates to be licensed in that country. Marketing materials such as catalogs and web sites were carefully analyzed. Telephone calls were made to recruiting offices by "prospective" applicants with a standard list of questions. In some cases, email correspondence was initiated. Special attention was paid to asking questions that would identify schools willing to deviate from stated admission criteria, especially those medical schools granting advanced standing to allied health care professionals. Additional questions focused on distance learning components of the curriculum as well as fulltime onsite attendance requirements at the basic science campus.




Site visits were made to admission offices by AAIMG members posing as prospective applicants or as an applicant-parent team. "Applicants" visited each basic science campus for tours and interviewed as many students, administrators and faculty members as time constraints permitted. Directors of hospital Medical Education departments and some preceptors were contacted to verify the medical school affiliation and comment on the quality of the medical students in schools under evaluation. An attempt was made to determine if the international medical school made any liaison efforts with the clerkship site and made regular visits to monitor student performance. Comprehensive data searches were conducted to determine if schools in the study had any history of legal problems with state licensing boards or loan groups. Any complaint or written material sent directly to AAIMG indicating serious infractions was verified through original sources.

We are pleased to release the results of our third set of evaluations of medical


schools located in the **Caribbean Basin, Mexico, the United Kingdom** and Central America. **The Eastern European Report remains as a separate section.** The results represent expanded evaluation process and a list of deficiencies by category and evaluation objective. **A total of 24 medical schools with programs admitting U.S. students were visited by our evaluation teams. Twelve medical schools were identified as meeting or exceeding minimum criteria in all evaluation categories, 12 were deficient. There are site visits pending for two new schools in the United Kingdom.**

AAIMG does not endorse any single school or program. It is purely an information source to assist applicants in making informed, realistic choices. All prospective medical students are urged to do their own investigation and draw their own conclusions by making a personal visit to the medical admission office and the basic science campus of any foreign school in their final selection pool. **However, it is the policy of AAIMG, however, to automatically place in the deficient category any school granting advanced placement for course credit to allied health professionals such as chiropractors, podiatrists, physician assistants or nurse practitioners. Likewise, any school with significant distance learning components as part of the curriculum or part-time attendance requirements is placed in the deficient category.**



AMERICAN ASSOCIATION OF INTERNATIONAL MEDICAL GRADUATES

AAIMG EVALUATION CRITERIA



SECTION I. Admission/Recruiting Practices

SECTION II. Basic Science Curriculum

SECTION III. Basic Science Campus

SECTION IV. Student Concerns

SECTION V. Clinical Training Program

SECTION VI. Faculty

SECTION VII. Financial

SECTION VIII. Legal/Other

Section I. Admission/Recruiting Practices:

- There is an admission office with qualified staff in the United States or the country of origin.
- A published current catalog must accurately represent the medical school program, composition of the faculty, clerkship training sites and campus facilities.
- Admission criteria for selecting students are clearly defined in the catalog. The MCAT or a comparable exam should be required. School does not deviate from stated requirements.
- Pre-medical requirements consisting of essential liberal arts and science courses are listed in the school catalog. No student is admitted with fewer than 90 semester hours of undergraduate education or equivalent credits from foreign countries.
- The application fee is a nominal amount. Students should not be required to pay additional monies to receive scholarship information, loan applications, or other types of consideration, or be required to pay a substantial fee to reserve a seat.
- A designated admission committee follows a standardized evaluation and interview process. Personal interviews of each applicant are highly desirable. All applicants should be encouraged to visit the basic science campus.
- The medical school does not grant advanced placement to physician assistants, chiropractors, podiatrists, nurse practitioners, or other applicants with allied health backgrounds.
- Transfer students are vigorously screened for equivalent educational standards. The medical school does not take students dismissed from other medical schools for academic or disciplinary reasons.
- Entering classes are of a size compatible with facility size and size of the faculty. There is sufficient classroom space and housing for all incoming students.